

**United States Bankruptcy Court
District of New Jersey**

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In re: Haydee Velazquez,
Debtor.

Case No.: 23-17261-JNP

Chapter: 13

Hearing Date: January 23, 2024

Judge: Poslusny

**BRIEF IN SUPPORT OF DEBTOR'S MOTION TO
OBJECT TO POSTPETITION MORTGAGE FEES,
EXPENSES, AND CHARGES BY FREEDOM MORTGAGE
CORPORATION**

The Court must disallow the postpetition mortgage fees, expenses, and charges incurred by Freedom Mortgage Corporation because most of the fees are unreasonable.

Freedom proffers that it cost \$550 to prepare its proof of claim, which is reasonable. However, it also proffers that it cost \$400 to review the plan and \$550 to draft and file its 1.5 page objection.

Assuming \$550 equals one hour of work, Freedom's plan review took forty-four minutes. To proffer that it took the same amount of time to prepare a 1.5 page objection as it took to prepare a detailed 22 page proof of claim is absurd.

Accordingly, the Court must disallow these fees.

Date: December 21, 2023

/s/ Michael I. Assad
Michael I. Assad